

**PLAINTIFFS'  
MOTIONS IN LIMINE  
1 TO PRECLUDE  
GOOGLE FROM  
RELYING ON NON-  
PUBLIC SOURCE  
CODE AT TRIAL**

**Exhibit 6**

**Redacted Version of  
Document Sought to  
be Sealed**

**Subject:** \*EXT\* RE: Brown - Source Code Review - Request to Print  
**Date:** Wednesday, February 22, 2023 at 11:58:12 PM Eastern Standard Time  
**From:** Joseph Margolies  
**To:** Ryan McGee x3030  
**CC:** QE Brown, Carl Spilly, Josef Ansorge, Google Team  
**Attachments:** ~WRD0363.jpg

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Ryan,

Thanks for the meet and confer today. I'm writing to follow up on some open points from our conversation:

1. We appreciate your representation that Plaintiffs will return the code printouts shortly after the March 2 hearing. We request that Plaintiffs return the printouts to Google within three business days following the hearing.
2. You were not able to say at the time of our meet and confer whether Plaintiffs intend to share source code printouts with experts other than Mr. Bhatia. As I explained this afternoon and reiterate here, we do not believe that the use of source code printouts to familiarize experts (who did not examine the code pursuant to Section 9(c) of the Protective Order) with source code is an appropriate use of those printouts under the Protective Order. Consistent with Section 9(e), we request that Plaintiffs provide Google with a list of any individuals who have inspected any portion of source code printouts following the return of those printouts after the hearing.
3. I understand that we agree that Google's production of source code files is within the scope of responding to the Court's Order to Show Cause, and that Plaintiffs do not intend to rely on that code for purposes other than the OSC. Google likewise does not intend to rely on source code for purposes other than the OSC. To the extent Plaintiffs later put the [REDACTED] log at issue and claim it joins authenticated and unauthenticated data, Google reserves the right to rely on the code on which it has already relied in the course of responding to the OSC.
4. Subject to the foregoing, Google agrees to Plaintiffs' requests for printouts of six of the seven excerpts we discussed. We will stamp those excerpts and ship them to your office address as previously agreed.
5. Based on our conversation today, we do not agree that your request for a printout of more than 2,250 lines of the QSEM proto (which is over 15% of our total source code production) is "limited" or "reasonably necessary" as required by the Protective Order. If after consultation with Mr. Bhatia Plaintiffs can further explain or narrow that request, we are open to discussing further.

Best,

Joe

**Joseph Margolies**  
*Associate,*  
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**From:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>  
**Sent:** Wednesday, February 22, 2023 4:30 PM  
**To:** Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>  
**Cc:** QE Brown <[qebrown@quinnemanuel.com](mailto:qebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansorge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>  
**Subject:** RE: Brown - Source Code Review - Request to Print

[EXTERNAL EMAIL from [rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)]

Thanks!

**Ryan McGee**  
Attorney  
[My Bio](#)

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**F:** (813) 222-4702  
**A:** 201 N Franklin St, 7th Floor, Tampa, FL 33602



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**From:** Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>  
**Sent:** Wednesday, February 22, 2023 5:27 PM  
**To:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>  
**Cc:** QE Brown <[qebrown@quinnemanuel.com](mailto:qebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansorge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>  
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Ryan,

You can find the recording at [this link](#).

Password to follow. Best,

Joe

**Joseph Margolies**

Associate,

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**From:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>

**Sent:** Wednesday, February 22, 2023 4:23 PM

**To:** Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>; Stephen Broome <[stephenbroome@quinnemanuel.com](mailto:stephenbroome@quinnemanuel.com)>

**Cc:** QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansorge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>

**Subject:** RE: Brown - Source Code Review - Request to Print

[EXTERNAL EMAIL from [rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)]

Hi Joe,

I haven't received the recorded Zoom video file yet. Can you please send it?

Thanks,

Ryan

**Ryan McGee**

Attorney

[My Bio](#)

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**F:** (813) 222-4702

**A:** 201 N Franklin St, 7th Floor, Tampa, FL 33602

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**From:** Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>  
**Sent:** Wednesday, February 22, 2023 2:44 PM  
**To:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>; Stephen Broome <[stephenbroome@quinnemanuel.com](mailto:stephenbroome@quinnemanuel.com)>  
**Cc:** QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansorge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>  
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---

Thanks, Ryan. I'll open up the meeting at 2:45 Eastern.

**Joseph Margolies**

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Quinn Emanuel Urquhart & Sullivan, LLP

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**From:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>  
**Sent:** Wednesday, February 22, 2023 1:42:50 PM  
**To:** Stephen Broome <[stephenbroome@quinnemanuel.com](mailto:stephenbroome@quinnemanuel.com)>; Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>  
**Cc:** QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansorge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>  
**Subject:** RE: Brown - Source Code Review - Request to Print

[EXTERNAL EMAIL from [rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)]

---

Ready when Joe (and anyone else on your side) are.

**Ryan McGee**

Attorney  
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---

**From:** Stephen Broome <[stephenbroome@quinnemanuel.com](mailto:stephenbroome@quinnemanuel.com)>  
**Sent:** Wednesday, February 22, 2023 2:41 PM  
**To:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>; Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>; Ryan McGee x3030 <[000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM](mailto:000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM)>  
**Cc:** QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansonge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>  
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We think it would potentially be useful, particularly given the court's comments about how informative she found the recording that the parties submitted. We don't necessarily need to record every meet and confer but can take it on a case by case basis. Seeing that you don't actually have any objection to recording, it seems the meet and can confer can reconvene.

---

**From:** Ryan McGee x3030 [<mailto:rmcgee@forthepeople.com>]  
**Sent:** Wednesday, February 22, 2023 11:35 AM  
**To:** Stephen Broome <[stephenbroome@quinnemanuel.com](mailto:stephenbroome@quinnemanuel.com)>; Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>; Ryan McGee x3030 <[000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM](mailto:000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM)>  
**Cc:** QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansonge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>  
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[EXTERNAL EMAIL from [rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)]

---

Steve – what's the need for recording?

If you're insisting – fine, say why (like we did) and let's do the meet and confer.

**Ryan McGee**  
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**From:** Stephen Broome <[stephenbroome@quinnemanuel.com](mailto:stephenbroome@quinnemanuel.com)>  
**Sent:** Wednesday, February 22, 2023 2:33 PM  
**To:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>; Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>; Ryan McGee x3030 <[000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM](mailto:000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM)>  
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---

You haven't answered my question – what is the objection to recording?

---

**From:** Ryan McGee x3030 [<mailto:rmcgee@forthepeople.com>]  
**Sent:** Wednesday, February 22, 2023 11:30 AM  
**To:** Stephen Broome <[stephenbroome@quinnemanuel.com](mailto:stephenbroome@quinnemanuel.com)>; Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>; Ryan McGee x3030 <[000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM](mailto:000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM)>  
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[EXTERNAL EMAIL from [rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)]

---

We requested recording when Google refused to bring engineers and wanted to spend substantial time explaining technical issues related to preservation, so the Special Master could review if needed.

Why is there a need to record this meet and confer?

And will this be “standard practice” (as Joe represented) moving forward?

**Ryan McGee**  
Attorney  
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**F:** (813) 222-4702  
**A:** 201 N Franklin St, 7th Floor, Tampa, FL 33602



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**From:** Stephen Broome <[stephenbroome@quinnemanuel.com](mailto:stephenbroome@quinnemanuel.com)>  
**Sent:** Wednesday, February 22, 2023 2:25 PM  
**To:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>; Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>; Ryan McGee x3030 <[000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM](mailto:000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM)>

[request@LISTS.SUSMANGODFREY.COM](mailto:request@LISTS.SUSMANGODFREY.COM)>

**Cc:** QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansonge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>

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---

What is the objection to recording? When plaintiffs requested recording last time our team agreed.

---

**From:** Ryan McGee x3030 [<mailto:rmcgee@forthepeople.com>]

**Sent:** Wednesday, February 22, 2023 11:24 AM

**To:** Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>; Ryan McGee x3030 <[000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM](mailto:000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM)>

**Cc:** QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansonge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>

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[EXTERNAL EMAIL from [rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)]

Joe,

Please let me know when more of your team is available.

I also note that is the first meet and confer during the 2+ years of litigation that Google has ever insisted be recorded. I had a met and confer with Tracy and Viola on Monday and they did not make that request.

Is that going to be the procedure moving forward?

Thanks,  
Ryan

**Ryan McGee**  
Attorney  
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2 pm Eastern works. I'll revise the invitation.

**Joseph Margolies**  
Associate,  
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**From:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>  
**Sent:** Wednesday, February 22, 2023 10:21 AM  
**To:** Ryan McGee x3030 <[000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM](mailto:000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM)>; Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>  
**Cc:** QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansorge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>  
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---

Sorry. Can we move this to 2p ET please?

**Ryan McGee**  
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**From:** [owner-googleteam@lists.susmangodfrey.com](mailto:owner-googleteam@lists.susmangodfrey.com) <[owner-googleteam@lists.susmangodfrey.com](mailto:owner-googleteam@lists.susmangodfrey.com)> on behalf of Ryan McGee x3030 <[000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM](mailto:000000513feb774f-dmarc-request@LISTS.SUSMANGODFREY.COM)>  
**Sent:** Wednesday, February 22, 2023 10:42:43 AM  
**To:** Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>  
**Cc:** QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansorge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>  
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Joe,

9:30a PT / 12:30p ET works for me.

In the meantime, does Google have substantive objections (i.e., other than the amount of lines requested) to the actual material that was requested? If so, please share them.

Thanks,  
Ryan

**Ryan McGee**  
Attorney  
[My Bio](#)

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**From:** Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>  
**Sent:** Tuesday, February 21, 2023 23:06  
**To:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>  
**Cc:** QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansorge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>  
**Subject:** \*EXT\* RE: Brown - Source Code Review - Request to Print

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Ryan,

We've reviewed your requests for paper copies of source code, which appear overbroad. The Protective Order limits printing requests to "limited portions of source code" that are "reasonably necessary for the preparation of court filings, pleadings, expert reports, or other papers." Dkt. 81, § 9(d). Paper copies are not for purposes of "reviewing the source code." *Id.*

Your requests encompass more than 2,800 lines of code—approximately 20% of the total code production. In

several instances, you've requested the entirety of a source code file. It's difficult to understand how this much code could be reasonably necessary for the preparation of your papers.

We're happy to meet and confer to try to narrow your requests. I'm flexible to find a time that works for you tomorrow after 8:30 am PST.

Best,

Joe

**Joseph Margolies**

*Associate,*

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191 N. Wacker Drive Suite 2700

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312-705-7444 Direct

312.705.7400 Main Office Number

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**From:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>

**Sent:** Tuesday, February 21, 2023 1:40 PM

**To:** Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>; QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansorge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>

**Cc:** Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>

**Subject:** Re: Brown - Source Code Review - Request to Print

[EXTERNAL EMAIL from [rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)]

Thanks Joe. The address in my signature line works.

Please promptly advise when you have had a chance to review the requested documents.

**Ryan McGee**

Attorney

[My Bio](#)

**P:** (813) 223-0931

**F:** (813) 222-4702

**A:** 201 N Franklin St, 7th Floor, Tampa, FL 33602



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

**From:** Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>  
**Date:** Tuesday, February 21, 2023 at 2:33 PM  
**To:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>, QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>, Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>, Josef Ansorge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>  
**Cc:** Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>  
**Subject:** \*EXT\* RE: Brown - Source Code Review - Request to Print

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Ryan,

I confirm receipt of your request. Pursuant to Section 9(d) of the Protective Order, we will review the files you've requested to be printed and determine whether we have any challenges to the amount of code requested. To the extent we do not challenge your request, we will send paper copies by next-day shipping with signature required. Please let us know the shipping address.

We remind Plaintiffs that any printed code must be treated securely, including in accordance with the procedures set out in Section 9(e) of the Protective Order.

Best,

Joe

**Joseph Margolies**  
*Associate,*  
Quinn Emanuel Urquhart & Sullivan, LLP

191 N. Wacker Drive Suite 2700  
Chicago, IL 60606  
312-705-7444 Direct  
312.705.7400 Main Office Number  
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**From:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>  
**Sent:** Tuesday, February 21, 2023 1:07 PM  
**To:** Joseph Margolies <[josephmargolies@quinnemanuel.com](mailto:josephmargolies@quinnemanuel.com)>; QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Carl Spilly <[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)>; Josef Ansorge <[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)>  
**Cc:** Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>

**Subject:** Brown - Source Code Review - Request to Print

[EXTERNAL EMAIL from [rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)]

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Counsel,

We have reviewed the source code and have identified portions that we request to be printed according to the protective order, § 9(d). The files have been PDF'd on the source code review machine and are all of the files on the desktop in the folder "To Print Feb 2023."

Please confirm.

Thank you,  
Ryan

**Ryan McGee**  
Attorney  
[My Bio](#)

**P:** (813) 223-0931

**F:** (813) 222-4702

**A:** 201 N Franklin St, 7th Floor, Tampa, FL 33602



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